Case 1:04-cv-10357-RCL

1. Sender

Document 199

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Model for Letters of Request recommended for use in applying the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

N.B. Under the first peragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

United States District Court for the District of

In order to avoid confusion, please spall out the name of the month in each date.

Please fill out an original and one copy of this form (use additional spece if required).

Massachusetts

		Boston, MA 02110		
2.	Central Authority of the Requested State	Master of the High Court Dublin, Ireland		
3.	Person to whom the executed request is to be returned	Lawrence Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110		
4,		Specification of the date by which the requesting authority requires receipt of the esponse to the Letter of Request		
	Date	October 1, 2008		
	Reason for urgency*			

Omit if not applicable.

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IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5.	a	Requesting judicial authority (Article 3,a))	United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110
	b	To the competent authority of (Article 3, a))	Master of the High Court Dublin, Ireland
	с	Names of the case and any identifying number	Sheldon G. Adelson v. Moshe Hananel C.A. No.: 04-cv-10357-RCL
6.	Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))		
	a	Plaintiff	Sheldon G. Adelson
		Representatives	Franklin H. Levy, Esq. Duane Morris, LLP 470 Atlantic Avenue, Suite 500 Boston MA 02110
	b	Defendant	Moshe Hananel
			Lawrence G. Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110
	С	Other parties	
		Representatives	

^{*} Omit if not applicable.

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7	. а	Neture of the proceedings (divorce, paternity, breach of contract, product llability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract
	b	Summary of complaint	Parties' employment agreement for investment options
	С	Summary of defence and counterdaim*	
	đ	Other necessary information or documents*	
8.	а	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
	b	Purpose of the evidence or judicial act sought	
9.		and address of son to be examined 3, e))*	Dermod Dwyer Dublin, Ireland
10.	persons stateme metter a	ns to be put to the to be examined or int of the subject-about which they are samined (Article 3, f))*	Dermod Dwyer will be examined regarding his knowledge of Hananel's work (wth Adelson on casino development and other matters.

9.

^{*} Omit if not applicable.

Filed 07/25/2008 Page 46 of 62 Document 199 Case 1:04-cv-10357-RCL 11. Documents or other property to be inspected (Article 3, g))* 12. Any requirement that the All deposition testimony is to be given under evidence be given on oath oath. or affirmation and any special form to be used (Article 3, h))* 13. Special methods or procedure Defendant's counsel is to conduct the to be followed (e.g. oral or depositions. in writing, verbatim, transcript or summary, cross-examination, etc.) (Articles 3, i) and 9)* 14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)* 15. Request for attendance or participation of Judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)*

^{*} Omit if not applicable.

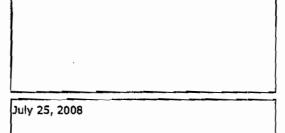
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 Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11, b))*

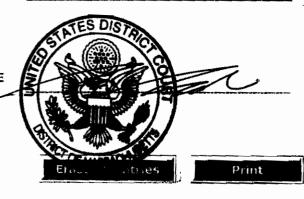
17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention

DATE OF REQUEST

will be bome by*



SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY



^{*} Omit if not applicable.